

Kurt C. Peterson, OSB #980065

kurt.peterson@harrang.com

HARRANG LONG P.C.

111 SW Columbia St., Suite 950

Portland, OR 97201

Telephone: (503) 242-0000

Julian Marrs, OSB #154743

julian.marrs@harrang.com

HARRANG LONG P.C.

800 Willamette Street, Suite 770

Eugene, OR 97401

Telephone: (503) 242-0000

Facsimile: (541) 686-6564

Of Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

ELIDA MAEVE,

Plaintiff,

vs.

**CENTENNIAL SCHOOL DISTRICT NO.
28J,**

Defendant.

Case No. 3:24-CV-01427-sb

**DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO
PLAINTIFF'S AMENDED
COMPLAINT**

RULE 7-1 CERTIFICATION

Pursuant to LR 7-1(a), counsel for Defendant Centennial School District No. 28J hereby certifies that they conferred with counsel for Plaintiff about this motion and Plaintiff does not oppose it.

MOTION

Pursuant to FRCP 6(b)(1)(A) and LR 16-3, Defendant respectfully requests an extension of time to **November 13, 2024** to respond to Plaintiff's Amended Complaint. Defendant conferred with Plaintiff regarding possible motions against the complaint and Plaintiff filed an Amended Complaint that is 54 pages long and contains 231 paragraphs with considerable detail. Defendant requests this extension of time to allow their counsel sufficient time to investigate the facts and allegations in the Amended Complaint and to prepare a response.

DATED this 18th day of October, 2024.

HARRANG LONG P.C.

By: s/Julian Marrs
Kurt C. Peterson, OSB #980065
Julian Marrs, OSB #154743
Of Attorneys for Defendant